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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12

13 UNITED STATES OF AMERICA,
14 Plaintiff,
15 v.
16 KEITH JACKSON,
17 Defendant.

Case No. 3:14-CR-00196 (CRB)

**DECLARATION OF SOMNATH RAJ
CHATTERJEE IN SUPPORT OF KEITH
JACKSON'S MOTION TO SUPPRESS
FRUITS OF ILLEGAL WIRETAPS, OR
IN THE ALTERNATIVE, FOR A
FRANKS HEARING**

21 **PREVIOUSLY FILED UNDER SEAL**
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1 I, SOMNATH RAJ CHATTERJEE, declare as follows:

2 1. My name is Somnath Raj Chatterjee. I am a partner with the law firm of Morrison
3 & Foerster LLP, counsel of record for Keith Jackson in this matter and am licensed to practice
4 before this Court and the courts of the State of California. I make this Declaration in Support of
5 Defendant's Administrative Motion to File Keith Jackson's Motion to Suppress Fruits of Illegal
6 Wiretaps, or in the Alternative, for a Franks Hearing. I have personal knowledge of the facts set
7 forth in this declaration, unless otherwise stated, and if called to testify, I could testify
8 competently thereto.

9 2. Various staff from my office reviewed and transcribed excerpts of audio
10 recordings produced by the government during discovery in this matter. Attached hereto as
11 **Exhibits 1 through 17** are uncertified transcriptions of the audio files excerpts.

12 3. Attached hereto as **Exhibit 18** is a true and correct copy of the document produced
13 by the government in this matter, Bates labeled US400268-359, that purports to be the Affidavit
14 of FBI Special Agent Ethan A. Quinn, filed by the government on November 13, 2012.

15 4. Attached hereto as **Exhibit 19** is a true and correct copy of the document produced
16 by the government in this matter, Bates labeled US400420-543, that purports to be the Affidavit
17 of FBI Special Agent Ethan A. Quinn, filed by the government on February 8, 2013.

18 5. Attached hereto as **Exhibit 20** is a true and correct copy of the document produced
19 by the government in this matter, Bates labeled US400587-691, that purports to be the Affidavit
20 of FBI Special Agent Maya N. Clark, filed by the government on April 3, 2013.

21 6. Attached hereto as **Exhibit 21** is a true and correct copy of the document produced
22 by the government in this matter, Bates labeled US401072-206, that purports to be the Affidavit
23 of FBI Special Agent Jennifer A. Garlie, filed by the government on May 9, 2013.

24 7. Attached hereto as **Exhibit 22** is a true and correct copy of the document produced
25 by the government in this matter, Bates labeled US401279-405, that purports to be the Affidavit
26 of FBI Special Agent Jason Jones filed by the government on July 1, 2013.

1 8. Attached hereto as **Exhibit 23** is a true and correct copy of the document produced
2 by the government in this matter, Bates labeled US400387-419, that purports to be the Fifteen
3 Day Report, filed by the government on December 3, 2012.

4 9. Attached hereto as **Exhibit 24** is a true and correct copy of the document produced
5 by the government in this matter, Bates labeled US400561-586 that purports to be the Fifteen Day
6 Report, filed by the government on February 28, 2013.

7 10. Attached hereto as **Exhibit 25** is a true and correct copy of the document produced
8 by the government in this matter, Bates labeled US400732-829, that purports to be the Fifteen
9 Day Report, filed by the government on April 25, 2013.

10 11. Attached hereto as **Exhibit 26** is a true and correct copy of the document produced
11 by the government in this matter, Bates labeled US401220-401261, that purports to be the Fifteen
12 Day Report, filed by the government on May 24, 2013.

13 12. Attached hereto as **Exhibit 27** is a true and correct copy of the document produced
14 by the government in this matter, Bates labeled US401417-29 that purports to be the Fifteen Day
15 Report, filed by the government on July 18, 2013.

16 13. Attached hereto as **Exhibit 28** is a true and correct copy of the document produced
17 by the government in this matter, Bates labeled US-611597, that purports to be an FBI interview
18 memorandum (302) dated December 12, 2014, describing FBI Special Agent Clark's submission
19 of a search warrant on Mr. Jackson's email provider on April 24, 2014.

20 I declare under penalty of perjury that the foregoing is true and correct. Executed this
21 26th day of March, 2015 at San Francisco, California. 

California.

SOMNATH RAJ CHATTERJEE